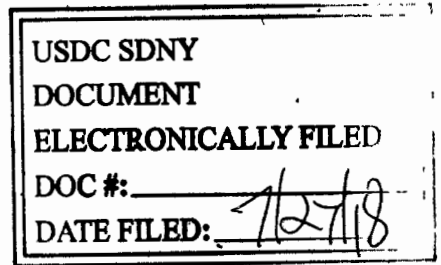


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



In re: PETROBRAS SECURITIES LITIGATION

This Document Applies To:

14-cv-9662 (JSR)

ALL CASES

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on April 20, 2018, Class Plaintiffs¹ filed a Motion for Final Approval of Settlement and Plan of Allocation ("Final Approval Motion");

WHEREAS, on April 20, 2018, Class Counsel filed a Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses ("Attorneys' Fees Motion");

WHEREAS, on May 18, 2018, Mathis and Catherine Bishop filed an Objection to Proposed Settlement and Fee Application, limited to an objection to the requested award of attorneys' fees;

WHEREAS, on June 25, 2018, this Court entered an Opinion and Order granting the Final Approval Motion, and granting in part the Attorneys' Fees Motion and instructing the Clerk to enter Final Judgment and to close the case, which the Clerk did on June 27, 2018;

WHEREAS, on July 2, 2018, this Court entered a Final Judgment incorporating by reference all aspects of the June 25, 2018 Order;

WHEREAS, on July 16, 2018, Mathis and Catherine Bishop filed a Notice of Appeal from the June 27, 2018 Final Judgment limited to the award of attorneys' fees;

¹ Unless otherwise noted, all capitalized terms have the meanings assigned to them in the Stipulation of Settlement and Release, ECF No. 767-1.

WHEREAS, under the Stipulation of Settlement and Release and the Amended Stipulation and Agreement of Settlement between PwC Brazil and plaintiffs dated February 1, 2018, ECF 767-10, an appeal “pertaining solely to . . . any order issued with respect to any application for attorneys’ fees and expenses . . . shall not in any way delay or preclude the Judgment from becoming Final” for purposes of, inter alia, distribution to Settlement Class Members;

WHEREAS, Mathis and Catherine Bishop are taking an appeal limited to the application for attorneys’ fees and expenses, and they and the parties desire to avoid any ambiguity and unnecessary delay and to permit this Court and the Claims Administrator to distribute the Settlement Fund to the Settlement Class Members;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties and Mathis and Catherine Bishop, either pro se or through their undersigned counsel, subject to approval by the Court, as follows:

1. Mathis and Catherine Bishop affirm that their appeal pertains solely to the issue of attorneys’ fees and expenses.
2. The pendency of this appeal does not preclude the Settlement from becoming Final.
3. This Stipulation may be signed in counterparts.

Date: July 20, 2018
New York, NY

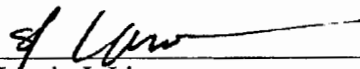
Stipulated and agreed to by:

POMERANTZ LLP

By: _____
Jeremy A. Lieberman
600 Third Avenue
New York, New York 10016
Tel: 212-661-1100
Fax: 212-661-8665
jalieberman@pomlaw.com

*Attorneys for Class Representatives and the
Settlement Class*

CLEARY GOTTlieb STEEN &
HAMILTON LLP

By:  _____
Lewis J. Liman
One Liberty Plaza
New York, New York 10006
Tel: 212-225-2000
Fax: 212-225-3999
lliman@cgsh.com

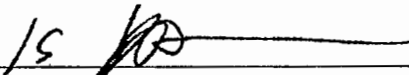
Attorneys for the Petrobras Defendants

KING & SPALDING LLP

By: _____
James J. Capra, Jr.
1185 Avenue of the Americas
New York, New York 10036
Tel: 212-556-2100
Fax: 212-556-2222
jcapra@kslaw.com

*Attorneys for Defendant
PricewaterhouseCoopers Auditores
Independentes*

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

By:  _____
Jay B. Kasner
Four Times Square
New York, New York 10036
Tel: 212-735-3000
Fax: 212-735-2000
jay.kasner@skadden.com

Attorneys for the Underwriter Defendants

By: _____
Mathis Bishop
Catherine Bishop
204 E. Oakview Place
San Antonio, Texas 78209
(210) 363-0840
mbishop170@gmail.com

In Pro Se

Date: July 20, 2018
New York, NY

Stipulated and agreed to by:

POMERANTZ LLP


By: _____
Jeremy A. Lieberman
600 Third Avenue
New York, New York 10016
Tel: 212-661-1100
Fax: 212-661-8665
jalieberman@pomlaw.com

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Settlement Class*

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By: _____
James J. Capra, Jr.
1185 Avenue of the Americas
New York, New York 10036
Tel: 212-556-2100
Fax: 212-556-2222
jcapra@kslaw.com

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PricewaterhouseCoopers Auditores
Independentes*

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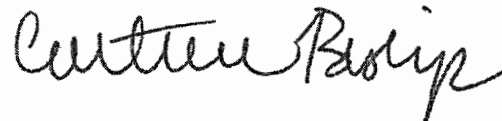
By: _____
Lewis J. Liman
One Liberty Plaza
New York, New York 10006
Tel: 212-225-2000
Fax: 212-225-3999
lliman@cgsh.com

Attorneys for the Petrobras Defendants

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

By: _____
Jay B. Kasner
Four Times Square
New York, New York 10036
Tel: 212-735-3000
Fax: 212-735-2000
jay.kasner@skadden.com

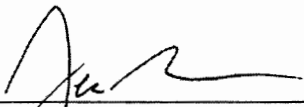
Attorneys for the Underwriter Defendants



Date: July 20, 2018
New York, NY

Stipulated and agreed to by:

POMERANTZ LLP

By: 
Jeremy A. Lieberman
600 Third Avenue
New York, New York 10016
Tel: 212-661-1100
Fax: 212-661-8665
jalieberman@pomlaw.com

*Attorneys for Class Representatives and the
Settlement Class*

CLEARY GOTTlieb STEEN &
HAMILTON LLP

By: _____
Lewis J. Liman
One Liberty Plaza
New York, New York 10006
Tel: 212-225-2000
Fax: 212-225-3999
lliman@cgsh.com

Attorneys for the Petrobras Defendants

KING & SPALDING LLP

By: _____
James J. Capra, Jr.
1185 Avenue of the Americas
New York, New York 10036
Tel: 212-556-2100
Fax: 212-556-2222
jcapra@kslaw.com

*Attorneys for Defendant
PricewaterhouseCoopers Auditores
Independentes*

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

By: _____
Jay B. Kasner
Four Times Square
New York, New York 10036
Tel: 212-735-3000
Fax: 212-735-2000
jay.kasner@skadden.com

Attorneys for the Underwriter Defendants

By: _____
Mathis Bishop
Catherine Bishop
204 E. Oakview Place
San Antonio, Texas 78209
(210) 363-0840
mbishop170@gmail.com

In Pro Se

Date: July 20, 2018
New York, NY

Stipulated and agreed to by:

POMERANTZ LLP

CLEARY GOTTlieb STEEN &
HAMILTON LLP

By: _____
Jeremy A. Lieberman
600 Third Avenue
New York, New York 10016
Tel: 212-661-1100
Fax: 212-661-8665
jalieberman@pomlaw.com

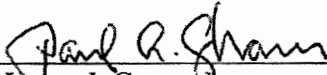
By: _____
Lewis J. Liman
One Liberty Plaza
New York, New York 10006
Tel: 212-225-2000
Fax: 212-225-3999
lliman@cgsh.com

*Attorneys for Class Representatives and the
Settlement Class*

Attorneys for the Petrobras Defendants

KING & SPALDING LLP

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

By:  _____
James J. Capra, Jr.
1185 Avenue of the Americas
New York, New York 10036
Tel: 212-556-2100
Fax: 212-556-2222
jcapra@kslaw.com

By: _____
Jay B. Kasner
Four Times Square
New York, New York 10036
Tel: 212-735-3000
Fax: 212-735-2000
jay.kasner@skadden.com

*Attorneys for Defendant
PricewaterhouseCoopers Auditores
Independentes*

Attorneys for the Underwriter Defendants

By: _____
Mathis Bishop
Catherine Bishop
204 E. Oakview Place
San Antonio, Texas 78209
(210) 363-0840
mbishop170@gmail.com

In Pro Se

GOODWIN PROCTER

By: 

Richard M. Strassberg
Daniel P. Roeser
620 Eighth Avenue
New York, New York 10018
Tel: 212-813-8800
Fax: 212-355-3333
rstrassberg@goodwinlaw.com
droeser@goodwinlaw.com

*Attorneys for Defendant Maria das Gracas
Silva Foster*

MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO PC

By: _____

Edward M. Spiro
565 Fifth Avenue
New York, New York 10017
Tel: 212-856-9600
Fax: 212-856-9494
espiro@maglaw.com

*Attorneys for Defendant José Sérgio
Gabrielli*

SO ORDERED.

Dated: _____

Honorable Jed S. Rakoff
United States District Judge

GOODWIN PROCTER

By: _____

Daniel P. Roeser
620 Eighth Avenue
New York, New York 10018
Tel: 212-813-8800
Fax: 212-355-3333
droeser@goodwinlaw.com

*Attorneys for Defendant Maria das Gracas
Silva Foster*

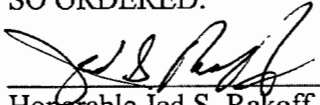
MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO PC

By: _____

Edward M. Spiro
565 Fifth Avenue
New York, New York 10017
Tel: 212-856-9600
Fax: 212-856-9494
espiro@maglaw.com

*Attorneys for Defendant José Sérgio
Gabrielli*

SO ORDERED.



Honorable Jed S. Rakoff
United States District Judge

Dated: _____

7/26/18